

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

D.V.D., *et al.*,

Individually and on behalf of all others
similarly situated,

Plaintiffs,

V.

U.S. Department of Homeland Security, *et al.*,)

Defendants.

No. 1:25-cv-10676-BEM

DEFENDANTS' AMENDED DECLARATION

On May 21, 2025, the Court ordered Defendants to identify the class members on the plane that was subject to the Court's inquiries during the May 20 and May 21, 2025 hearings. ECF No. 120-121. Pursuant to the Court's order, Defendants submitted a responsive declaration on May 22, 2025. ECF No. 124. Defendants now submit the attached amended declaration to provide further details about the criminal histories of the aliens on the plane.

Respectfully submitted,

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Acting Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General

ELIANIS N. PEREZ
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/s/ Mary L. Larakers
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CERTIFICATE OF SERVICE

I, Mary Larakers, Senior Litigation Counsel, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Mary L. Larakers

Mary L. Larakers

Senior Litigation Counsel

Dated: May 23, 2025